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SUIT BY FOREIGN STOCK CORPORATION—WHAT CONSTITUTES “DOING BUSINESS IN THIS STATE”—CF. SEC. 1105, VA. CODE 1904.—In *Penn Colliers Co. v. McKeever*, decided Nov. 21, 1905, it was held:

The statutory provision of the General Corporation Law that no foreign stock corporation “doing business in this State” shall maintain an action on a contract made here unless prior thereto it had procured a certificate from the Secretary of State authorizing it to do business, does not apply to the case of a single sale of goods by a foreign corporation in this State which had no general or established business here and did not contemplate any at the time of the sale. The corporation may, under such circumstances, maintain an action on the contract though no certificate had been issued to it.

Compare sec. 1105, Va. Code 1904, where the statute makes each transaction a separate offense against the section.

MARRIAGE AND DIVORCE—ALIMONY—COUNSEL FEES—CF. SEC. 2261, VA. CODE 1904.—In *Brinsmade v. Brinsmade*, decided by the Court of Appeals of New York, Dec. 5, 1905, it was held:

In an action brought by a wife against her husband, to annul their marriage on the ground that the husband was insane at the time of the marriage, the Supreme Court (our Circuit Court) has no power to grant alimony *pendente lite* or counsel fee to the plaintiff.

Compare Sec. 2261, Va. Code 1904, where the whole matter is left to the discretion of the court.

As to payment of attorney's fee, see 8 VA. LAW REG. 204.

CONSTITUTIONAL LAW—DISCRIMINATION BETWEEN RACES—STREET CAR ACCOMMODATION—CF. SECS. 1294D (41-44) AND 1294F, VA. CODE 1904.—In *State v. Patterson*, decided by the Supreme Court of Florida in July, 1905 (39 So. 398), it was held that an act requiring street car companies to provide separate compartments in their cars for the Caucasian and African races, and that under penalties prohibits persons of either of said races from occupying the compartment of a car set apart for the other race, but with the proviso “that the provisions of this act shall not apply to colored nurses having the care of white children or sick white persons,” violates section 1 of the fourteenth amendment to the Federal constitution, and is void.

It was further held that the obnoxious section could not be segregated and that the entire statute must be held void. The court said in part:

We are entirely clear that section 7 of the questioned act is violative of section 1 of the fourteenth amendment to the constitution of the United States, in that it discriminately abridges the privileges and immunities of one class of citizens of the United States by giving to another class of such citizens privileges that are withheld from the class discriminated against. It gives to the Caucasian, mistress the right to have